

EXHIBIT B

Videotaped Deposition of
Tracy Wolff
March 07, 2023

Freeman

vs.

Deebs

Confidential



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Freeman vs. Deebs

Tracy Wolff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

3 LYNNE FREEMAN,)
4 AN INDIVIDUAL)
5 PLAINTIFF,)
6 VS.)
7 TRACY DEEBS-ELKENANEY)
8 P/K/A TRACY WOLFF, AN)
9 INDIVIDUAL, EMILY SYLVAN)
10 KIM, AN INDIVIDUAL,)
11 PROSPECT AGENCY, LLC, A)
12 NEW JERSEY LIMITED) CASE NO. 1:22-CV-02435-LLS
13 LIABILITY COMPANY,)
14 ENTANGLED PUBLISHING,)
15 LLC, A DELAWARE LIMITED)
16 LIABILITY COMPANY,)
17 HOLTZBRINCK PUBLISHERS,)
18 LLC D/B/A MACMILLAN,)
19 A NEW YORK LIMITED)
20 LIABILITY COMPANY, AND)
21 UNIVERSAL CITY STUDIOS,) JOB NO. 10115799
22 LLC, A DELAWARE)
23 LIMITED LIABILITY COMPANY)
24 DEFENDANTS.)

16 ORAL AND VIDEOTAPED DEPOSITION OF
TRACY WOLFF
17 MARCH 07, 2023

18 *****

20 ORAL AND VIDEOTAPED DEPOSITION of TRACY WOLFF,
21 produced as a witness at the instance of the Plaintiff,
22 and duly sworn, was taken in the above-styled and
23 numbered cause on the 7th day of March, 2023, from 8:54
24 a.m. to 4:34 p.m., before Gabriela S. Silva, CSR, RPR in
25 and for the State of Texas, reported by stenograph, at
the Law Offices of Kowert, Hood, Munyon, Rankin &
Goetzl, 1120 S. Capital of Texas Hwy, Building 2,
Austin, Texas, pursuant to the Federal Rules of Civil
Procedure and the provisions stated on the record or
attached hereto.

Confidential**Tracy Wolff****Freeman vs.
Deebs**1 A P P E A R A N C E S
2

3 COUNSEL FOR THE PLAINTIFF:

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18 CECE COLE
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21 New York, New York 10010
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24 ALSO PRESENT:

25 Mr. Walter Bryan, Videographer
Mr. Trent Baer, Plaintiff's Husband
Mr. Lance Koonce (via Zoom)
Mr. Zachary Press (via Zoom)
Mr. Stephen Doniger (via Zoom)
Mrs. Lynne Freeman (via Zoom)

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1 started any. Liz Pelletier, I believe, started one or
2 two.

3 **Q. Are you aware, was there an access log to the**
4 **Google Docs?**

5 A. I don't know what an access log is.

6 **Q. Well, access log would be a listing that shows**
7 **who had accessed the Google Docs at any time. Did you**
8 **ever see anything like that?**

9 A. No.

10 **Q. And maybe because you're not the owner?**

11 A. Yeah, I -- I don't know.

12 **Q. Did you use any text spinning software to write**
13 **any of the books in the Crave book series?**

14 A. I'm sorry. I don't understand the question.

15 **Q. Are you familiar with text spinning software?**

16 A. I have no idea what that is.

17 **Q. Well, did you use any other kind of software --**
18 **did you use any kind of software to write or edit the**
19 **books in the Crave book series other than what we've**
20 **already discussed?**

21 A. I used Microsoft Word.

22 **Q. Did you use any artificial intelligent bots that**
23 **are able to reword sentences in writing any of the books**
24 **in the Crave book series?**

25 A. I did not.

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CASE NO. 1:22-CV-02435-LLS

REPORTER'S CERTIFICATION
DEPOSITION OF TRACY WOLFF
March 07, 2023

I, Gabriela S. Silva, Certified Shorthand
18 Reporter in and for the State of Texas, hereby certify
to the following:

19 That the witness, TRACY WOLFF, was duly sworn by
the officer and that the transcript of the oral
20 deposition is a true record of the testimony given by
the witness;

21 I further certify that pursuant to FRCP Rule
30(f)(1) that the signature of the deponent:

23 X was requested by the deponent or a party before
the completion of the deposition and that the signature
is to be before any notary public and returned within
24 30 days from date of receipt of the transcript. If
returned, the attached Changes and Signature Page
25 contains any changes and the reasons therefor;

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Deebs**

1 _____ was not requested by the deponent or a party
2 before the completion of the deposition.

3 I further certify that I am neither counsel for,
4 related to, nor employed by any of the parties or
5 attorney in the action in which this proceeding was
6 taken, and further that I am not financially or
7 otherwise interested in the outcome of the action.

8 Certified to by me this 13th day of
9 March, 2023.



10 Gabriela S. Silva, Texas CSR(8706), RPR
11 Expiration Date: 01-31-25
12 Aptus Court Reporting
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